

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEX ANAGNOSTOPOULOS, (01),
[DOB: 06/23/1965]

ZACHARY P. CASSITA, (02),
a/k/a "Sonny"
[DOB: 05/11/1986]

and

IRVIN LLOYD DEAN, (03),
[DOB: 08/10/1963]

Defendants.

No. _____

COUNT ONE: (ALL DEFENDANTS)

Conspiracy to Distribute a Controlled Substance

21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846

NLT: 10 Years' Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years' Supervised Release

Class A Felony

ALLEGATION OF CRIMINAL FORFEITURE

(ALL DEFENDANTS)

21 U.S.C. § 853

Plus a \$100 Special Assessment for each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Conspiracy to Distribute a Controlled Substance

On or between October 1, 2017 and continuing to present, the exact dates unknown to the Grand Jury, within the Western District of Missouri and elsewhere, the defendants ALEX ANAGNOSTOPOULOS, ZACHARY P. CASSITA, a/k/a "Sonny" and IRVIN LLOYD DEAN, did knowingly and intentionally combine, conspire, confederate and agree with each other and others, both known and unknown to the Grand Jury, to distribute 1,000 kilograms or more of a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Upon conviction of the controlled substance offense alleged in Count One of this Indictment, each defendant named herein shall forfeit to the United States any and all property, real and personal, constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation of Forfeiture. Further, each defendant named herein shall forfeit to the United States any and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Count One of this Indictment, including, but not limited to the following:

Approximately \$26,875 in United States currency seized by the Kansas City, Missouri Police Department on November 21, 2017; and

A money judgment representing all proceeds each defendant obtained directly or indirectly as a result of his participation in the drug conspiracy alleged in Count One, based on a conservative street price of \$1,500 for one (1) pound of marihuana and the total conspiracy distribution of more than 4,964.7 pounds of marihuana, totaling approximately \$7,447,050 in U.S. Currency in conspiracy proceeds.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

5/26/2020
DATE

/s/ Cynthia Johnson
FOREPERSON OF THE GRAND JURY

/s/ Bradley K. Kavanaugh
Bradley K. Kavanaugh
Assistant United States Attorney
Violent Crime & Drug Trafficking Unit
Western District of Missouri